

**McClellanville 115-kV Transmission Line Project
Environmental Impact Statement
Scoping Summary Report**

prepared for the



**U. S. Department of Agriculture
Rural Utilities Service**

by

The Mangi Environmental Group, Inc.

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1.0 Introduction

The U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) is considering a request from Central Electric Power Cooperative, Inc. (CEPCI) to fund construction of an electric power transmission line (referred to in this report as the “proposed Project” or the “Project”). Prior to making a decision to finance the proposed Project, RUS is required to complete an environmental review process in compliance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality’s regulations for implementing NEPA (40 CFR Parts 1500–1508), and RUS’s NEPA implementing regulations, Environmental Policies and Procedures (7 CFR Part 1794). RUS has decided to prepare an Environmental Impact Statement (EIS) for the proposal. Because the proposal includes corridors that may traverse the Francis Marion National Forest, the U.S. Forest Service (USFS) is a cooperating agency in the preparation of the EIS.

This report describes the proposed Project, agency and public scoping meetings and materials, and summarizes substantive comments received during the scoping period which was held from September 29, 2010 through January 14, 2011. The document includes the following eleven appendices:

- Appendix A – Notices of Intent
- Appendix B – Public Meeting Newspaper Notices and Affidavits
- Appendix C – Public Newsletter, follow-up postcard, PSA text, list of Radio Stations
- Appendix D – Letters Sent to Agencies
- Appendix E – Agency and Public Scoping Meeting Sign-In Sheets
- Appendix F – Public Scoping Meeting Materials
- Appendix G – Public Scoping Comment Form
- Appendix H – Index of Public and Agency Comments by Source and Date
- Appendix I – Index of Public and Agency Comments by Category
- Appendix J – Comment Forms, Letters, Emails, Court Reporter Transcript, and Petition
- Appendix K – Consultation Requests

2.0 Proposed Project Description

Central Electric Power Cooperative, Inc. (CEPCI) is proposing to construct, own, and operate the proposed Project, which would consist of a new 115 kilovolt (kV) transmission line to originate at one of six power sources and terminate at Berkeley Electric Cooperative's (BEC's) proposed new McClellanville substation. The six optional sources include three existing power sources—at Charity, Jamestown, or the Commonwealth line—and three source points that are not yet built—a Belle Isle switching station, a step-down switching station on the 230-kV line at Honey Hill, or a step-down station on the same line at Britton Neck. CEPCI is pursuing financial assistance from RUS to construct the proposed Project.

To provide agencies and the public with a general understanding of the proposed Project, CEPCI prepared an Alternative Evaluation Study (AES), and Mangi Environmental Group prepared a Macro-Corridor Study (MCS). The AES explained the need for the proposed Project, discussed the alternatives that have been considered to meet that need, and recommended an alternative that was considered best for fulfilling the need. The MCS defined the Project area, illustrated the Project start and end points, and identified potential transmission line alignments and associated corridors for locating the proposed Project. Alignment rights-of-way identified in the MCS analysis were modeled as 30 meters (98.4 ft) wide to account for the proposed typical 75-ft wide right-of-way. (Standard pole height would be 70 ft though the MCS did not require this parameter for the analysis). A total of 12 corridors were identified; each corridor varying in width from a few hundred feet to a few miles and in length from 10-33 miles. These alignments and associated corridors were developed based on environmental, engineering, economic, land use data, and regulatory constraints. The AES and MCS (dated September 2010) are available for review on the RUS website at <http://www.usda.gov/rus/water/ees/eis.htm> or upon request to RUS.

One of the optional power sources was not evaluated in terms of a potential alignment and corridor in the MCS because it was identified during the public scoping period. The Commonwealth line is a recently built 115-kV transmission line between Hamlin and the Commonwealth substation located at 1218 Lieben Road, Mt Pleasant, SC, 29464. The new alternative route corridor would extend the transmission line northeast from the Commonwealth substation parallel to Highway (Hwy) 17, use the portion of the Charity route corridors that parallels Hwy 17, and end at the McClellanville substation.

3.0 Notification of Scoping Meeting and Extension of Scoping Period

A Notice of Intent (NOI) was published in the *Federal Register* on September 17, 2010, informing the public of RUS's intent to prepare an EIS. The notice included details about the public scoping meeting held on September 29, 2010. The NOI was published 12 days before the scheduled public scoping meeting as opposed to 14 days. However, RUS decided that because the proposal was one of local and not national importance, the public scoping meeting would take place at the pre-determined date and location. A copy of the NOI and administrative memorandum are provided in Appendix A.

Notices were printed in local newspapers in the weeks preceding the public scoping meetings, including an advertisement that identified the meeting times and locations; a legal notice similar to the NOI was published as required by RUS regulations. A list of the names of the publications and dates of these advertisements and legal notices are included in Table 1. Copies of the newspaper advertisements and legal notices are included in Appendix B.

Table 1 – Newspapers and Dates of Public Notices

Newspaper	Publication Dates	Location
<i>The Post and Courier</i>	September 18 and 19, 2010	Charleston, SC
<i>Georgetown Times</i>	September 17, 2010	Georgetown, SC

Additional methods were used to notify agencies and the public about the scoping meetings. These are discussed in Sections 4.2 and 5.2 of this report.

A Project EIS newsletter (Vol. 1, No. 1) was distributed to approximately 6,000 landowners, BEC customers, interested parties, and individuals who requested to be on the Project EIS mailing list. The mailing list was developed initially using Charleston, Berkeley, and Georgetown county landowner data within the study area. Because this initial newsletter contained the wrong address for the school at which the September 29 public scoping meeting was to be held, a postcard was distributed to those recipients with the corrected address. A 30-second Public Service Announcement (PSA) was aired on local radio stations for the week prior to and the week of the public scoping meetings.

A mailing error in Charleston County and the addition of the Commonwealth alternative led RUS to publish an updated NOI in the *Federal Register* on December 8, 2010; announcing that the public scoping period had been extended to January 14, 2011. While RUS decided not to hold a second public scoping meeting, the mailing error was promptly rectified, and proper notification and information were distributed. A second edition of the Project EIS newsletter (Vol. 1 No. 2) included Project background information with a description of the new Commonwealth alternative, a RUS Environmental Review Process handout, and notification of the extended public scoping comment period. This was distributed to agencies, NGOs, and those

2,000 landowners, BEC customers, interested parties, and individuals who requested to be on the Project EIS mailing list, residing in Charleston County. A postcard including notification of these changes was simultaneously distributed to the 4,000 Berkeley County and Georgetown County landowners, BEC customers, interested parties, and individuals who requested to be on the Project EIS mailing list. Public display ads were published in local newspapers; a list of the names of the publications and dates of these advertisements and legal notices are included in Table 2. Copies of these are included in Appendix B.

Table 2 - Newspapers and Dates of Public Notices

Newspaper	Publication Dates	Location
<i>The Post and Courier</i>	December 15, 16, and 17	Charleston, SC
<i>The Georgetown Times</i>	December 15	Georgetown, SC

A script of the one-minute PSA announcing the aforementioned changes, a list of radio stations, and the dates and times aired are included in Appendix C. The RUS Project EIS website was also used to disseminate the public scoping schedule and other Project information to stakeholders. A copy of newsletters, postcards, PSA text and list of radio stations to which the PSA was provided are included in Appendix C.

4.0 Agency Scoping Meetings

RUS conducted a scoping meeting for federal, state, and local agencies which consisted of presentations by RUS, CEPCL, and Mangi Environmental Group; followed by a question-and-answer session. The agency scoping meeting was held September 29, 2010 at the Sewee Visitor and Environmental Education Center, located at 5821 Highway 17, North Awendaw, SC 29429.

4.1 Purpose

The purpose of the agency scoping meeting was to provide agencies with information regarding the proposed Project, answer questions, identify concerns regarding the potential environmental impacts that may result from construction and operation of the proposed Project, and gather information to determine the scope of issues to be addressed in the forthcoming EIS. The notification process, public scoping meeting materials, and the process for collecting public comments are described in the following sections.

4.2 Notification

RUS notified federal, state, and local agency representatives of the proposed Project by mail. Federal and state agencies received a letter detailing the role of RUS in the proposed Project, the availability of the AES and MCS, the dates and locations of the public and agency scoping meetings, contact information for the RUS representatives assigned to the proposed Project, and methods for submitting comments. A list of federally recognized tribes near the proposed Project was compiled; tribal leaders and Tribal Historic Preservation Officers (THPOs) were notified by mail. Additional information on Section 106 coordination with tribes is provided in Section 3.4. A copy of the federal and state agency letter, the local government letter, the Tribal letter, the THPO letter and a list of recipients for each are included in Appendix D.

4.3 Agency Attendance

A total of 15 participants representing the following entities signed in at the September 29, 2010 agency scoping meeting.

- USDA Forest Service
- South Carolina Department of Natural Resources
- U.S. Fish and Wildlife Service
- South Carolina Forestry Commission
- Town of McClellanville

4.4 Tribal Consultation

Tribal leaders and THPOs received letters with similar information provided to the agencies as well as information on the Section 106 consultation process. No tribal representatives attended the agency scoping meeting in September 2010. The Catawba Indian Nation, however, requested to be a part of consultation. The Eastern Shawnee Tribe requested that they be informed if cultural resources are discovered as the proposed Project progresses. Consultation requests are included in Appendix J.

4.5 Agency Comments

The following federal, state, and local agencies and tribes provided written scoping comments:

- USDA Forest Service
- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers
- S.C. Department of Natural Resources
- Fish and Wildlife Service – Cape Romain National Wildlife Refuge (NWR)
- S.C. Forestry Commission
- Charleston County Planning Department

Appendix H is an index of comments by source (e.g., Federal, individual, etc.) and date, and Appendix I includes an index of comments by category. Comments received during the extended scoping period are italicized in both Index H and I.

5.0 Public Scoping Meeting

RUS conducted a public scoping meeting in an open-house format with formal presentations by RUS, CEPCI, and the Mangi Environmental Group. The meeting was held on Wednesday, September 29, 2010 from 5 to 9 p.m. at St. James-Santee Elementary School, 8900 Highway 17 North, McClellanville, South Carolina 29458.

5.1 Purpose

The purpose of the public scoping meeting was to provide the public with information regarding the proposed Project, answer questions, identify concerns regarding the potential environmental impacts that may result from construction and operation of the Project, and gather information to determine the scope of issues to be addressed in the RUS environmental review and documentation for the proposed Project (RUS Bulletin 1794A-603). The notification process, public scoping meeting materials, and the process for collecting public comments are described in the following sections.

5.2 Notification Process

In addition to the RUS requirements specified in Section 2.0, general public notification also occurred by direct mail through newsletters and postcards and by radio PSAs. RUS published a notice in the *Federal Register* on September 17, 2010, of RUS's intent to prepare an EIS and hold a public scoping meeting. A legal notice and newspaper advertisements were printed on September 18 and 19 in two local newspapers. A newsletter (Vol. 1, No. 1) with information on the proposed Project and scoping meeting date and location were sent to approximately 6,000 stakeholders and residents in the proposed Project study area during the week of September 21. In addition, CEPCI sent fact sheets, comment forms, and large-format maps to county offices in the week prior to public scoping meetings.

These materials are included in Appendices A, B, and C.

5.3 Public Scoping Meeting Materials

An open-house format was used to encourage discussion and information sharing and to ensure that the public had opportunities to speak with RUS, USFS, and Project representatives. Several stations were staffed by representatives of RUS, CEPCI, and Mangi Environmental. Information stations at the public scoping meetings included the following:

- Sign-in and Welcome
- USDA RUS, NEPA and Federal Environmental Review Process
- Project Overview, Purpose and Need
- General CEPCI information

- CEPCI Right-of-Way brochure
- CEPCI Landowners letter
- Geographic Information System (GIS) mapping
- Electric and magnetic fields
- Parcel information and maps with detailed routes

Sign-in sheets (Appendix E) and comment forms were made available to all scoping meeting attendees. Public scoping meeting materials are included in Appendix F. A copy of the public comment form is included in Appendix G.

5.4 Collecting Comments

Public comments were submitted using comment forms, letters, and emails. All comments were directly delivered to RUS or forwarded if they were addressed to CEPCI by the commenter. A summary of the public comments received and organized by category is provided below. Each of these were referred to as an item and entered into the comment management database. The items were indexed based on the source of the comments including Federal agency (F), state agency (S), local agency (L), Tribe (T), non-government organization (N), or individual (I). Appendix H includes an index of comments by source and date. The item was cataloged with a number based on the order it was received by RUS (e.g. I-047) and each comment associated with an item was given a unique number (e.g. I-047-001). Appendix I is an index of comments by category. This index shows each comment that was considered under each of the categories described below. Comments received during the extended scoping period are italicized in both Index H and I. The individual comments received are included in Appendix J. The following summarizes the general comments received by category.

5.5 Summary of Comments

A total of 750 comments were received during the scoping comment period. Of the total, 260 were a count of boxes checked by a commenter on the scoping meeting comment form (see Appendix G). The form asks commenters to indicate by a check mark which of eight categories were issues of concern for them regarding the construction of the transmission line. Where those same commenters made written notes on their comment form, those were compiled and tabulated as separate comments. Normally RUS will provide a 30-day comment period following the scoping meetings that would begin on the date of the latest meeting (RUS Bulletin 1794A-603). Due to a mailing error with the Charleston County property owner addresses and the addition of the Commonwealth Alternative, the scoping period was extended until January 14, 2011. Seventy-seven (77) comments were received during the extended scoping period. Each category indicates the total number of comments received during the entire scoping period, but mentions what number were received during the extended scoping period (if any). Alternately, the

Commonwealth alternative was added as a subsection to Route Alternatives (5.5.1) to address comments exclusively received during the extended scoping period and that pertain to the Commonwealth alternative. The comments received after the deadline are not included in this report, but will continue to be collected and considered by RUS in the preparation of the EIS.

5.5.1 Construction

Six (6) comments were received – three (3) of which were received during the extended scoping period – regarding potential impacts and activities related to construction. Two addressed current distribution line(s); one requested clarification regarding what portion(s) of current distribution lines would be removed or modified, and the other offered that the current Mount Pleasant to McClellanville line (through Awendaw) be explored as a Project alternative and that the costs to repair the distribution line and construct a new transmission line and the proposed substation be fully vetted. The others voiced concern that construction of a new line would result in a number of adverse impacts to soils, vegetation, and wildlife. One pointed out the higher construction standards and costs associated with building a transmission line in a hurricane-prone area.

5.5.2 Cultural and Historic Resources

Fifty-nine (59) comments were received regarding cultural and historic resources, two (2) of which were received during the extended scoping period. The comments ranged from general concerns to specific sites, such as the Mt. Moriah plantation, an old slave graveyard, former rice and cotton plantations, Indian burial grounds and campsite, and the French Huguenot monument. Many of the comments addressing specific cultural, historic and archaeological resources expressed opposition to the Jamestown to McClellanville corridor. Commenters requested that these places be avoided and that potential impacts be addressed in the EIS.

One tribe requested they be notified if cultural resources (including human remains) are recovered during construction.

5.5.3 Health and Safety

Forty-nine (49) comments – one (1) of which was received during the extended scoping period – were received regarding health and safety concerns. Two commenters expressed concern about health risks associated with electromagnetic fields (EMF). They requested that direct, indirect, and cumulative impacts from EMF be addressed in the EIS. Two commenters requested that undergrounding the line be considered as an alternative, which would make the line less susceptible to damage from storm winds. One commenter supported this argument by referring to the damage caused by Hurricane Hugo.

5.5.4 Land Rights

Thirteen (13) comments were received regarding land rights, three (3) of which were received during the extended scoping period. One commenter was concerned with the 300-foot buffer for private parcels with structures 6 acres and smaller. Another pointed out that although the Charity

alternative corridor plan crosses a protected area for the red cockaded woodpecker (which is within the inclusion zone contemplated by the corridor plan), the 200 foot buffer does not seem to be given its required exclusionary status. Another suggested that the existing 230-kV Santee power line be considered as a routing alternative and the right-of-way should be enlarged accordingly. Two addressed potential issues with the right-of-way – 1) that it would conflict with plans to place a conservation easement on the landowner’s property and 2) that the 70-foot right-of-way required for the proposed Project would pose a threat to the integrity of the National Forest because use of herbicides and removal of forest understory is a common practice for this type of construction, and it can disrupt the forest canopy and facilitate the spread of invasive species. The U.S. Fish and Wildlife Service outlined their special use permit policy under the National Wildlife Refuge System Improvement Act of 1997 as it applies to the Cape Romain NWR.

5.5.5 Land Use

Sixty-eight (68) comments were received regarding land use – three (3) of which were received during the extended scoping period. The majority of the commenters suggested that the potential impacts to existing homes and future home construction be considered and that ultimately they be avoided. Several commenters complained that a transmission line traversing farmland would cause a loss of income. Another commented that he would no longer be able to manage his property for its current purposes (wildlife, hunting, and farming) and was concerned that the proposed transmission line would open up his land to poachers. Several more did not believe that building a transmission line was a good use of pristine land and that the costs to the environment would outweigh the benefits. One commenter referred to his future plan to build homes and a summer camp for those with special needs.

5.5.6 NEPA Process

Thirty (30) comments were received regarding the various aspects of the NEPA process required for the proposed Project – six (6) of which were received during the extended scoping period. These comments included questions regarding alternatives, required studies and analyses, and the definition of the Project area.

Several commenters questioned the analysis of alternatives in the 2010 AES and the 2010 MCS, citing the following issues:

- Environmental consequences have not been compared between the Project alternatives and the No Action alternative.
- Address the No Action and other similar alternatives: consider other actions that might satisfy the Project objective if the Project is not pursued, including expanding existing distribution lines or running the distribution line underground.
- Re-evaluate the quantification of variables in the MCS, specifically the Francis Marion National Forest, Cape Romain Wildlife Refuge, and Bonneau Ferry.

- Re-evaluate cost of Project to capture rebuilding of a substation in the Jamestown corridor.
- Evaluate and consider alternatives like weatherizing homes, subsidizing local wind and solar projects, implementing a net metering policy and load reduction home retrofit programs.

Comments regarding the studies and analysis done in accordance with NEPA were as follows:

- Several commenters specifically disagreed with the low values assigned to the Francis Marion National Forest, Santee Delta Wildlife Management Area, and private conservation easements in the MCS
- A few others found the cost-benefit analysis to be inaccurate by a factor of 10, pointing out that SCE&G was not factored into the analysis.
- Environmental impact studies should be completed in the Francis Marion National Forest including proposed, endangered, threatened, and forest sensitive (PETS) species, cultural resources, and plants; a cumulative impacts study should be conducted; best available ecological information should be used; easement and protected land files with the most recent acquisitions and land holdings should be updated.

5.5.7 Proposed Project Alternatives

Thirty-two (32) comments were received regarding proposed electric system alternatives – seven (7) of which were received during the extended scoping period. In general, commenters suggested a range of alternatives to the proposed Project presented in the AES, including renewable energy generation and distribution, distributed generation, on-site generation at the proposed McClellanville substation, implementation of a net metering policy and load reduction retrofit program, undergrounding of the entire or portions of the proposed Project, the No Action Alternative, rebuilding of existing routes and/or structures, conservation/reducing demand, or a combination of these aforementioned alternatives. There were many suggestions for alternative locations included paralleling the existing 230 kV Santee power line or a new alignment paralleling Route 17.

5.5.8 Public Involvement Process

Thirty-six (36) comments were received regarding the public involvement process – five (5) of which were received during the extended scoping period. Some commenters found the public scoping meeting informative; others found the materials misleading or confusing. A few complained that the public scoping meeting was inaccessible and that another meeting should have also been held in Jamestown, SC. One commenter was frustrated with the mailing error in Charleston County.

5.5.9 Purpose and Need

Fifty-two (52) comments were received regarding the proposed Project purpose and need as defined at the public meetings – two (2) of which were received during the extended scoping period. Many commenters indicated that the No Action alternative had been dismissed without adequately evaluating the purpose and need given the already existing transmission corridors; or that energy needs could be met in ways less destructive to the environment, health, historic/cultural resources, and visual/aesthetic resources. Several commenters suggested that the environmental costs of an additional transmission corridor outweighed the benefits and that the incomplete cost-benefit analysis does not reflect this.

Regarding the reliability within the McClellanville area, many of these commenters questioned the local need for the proposed Project since reliability concerns and projected demand did not seem significant enough to warrant the proposed Project.

5.5.10 Recreation

Five (5) comments were received regarding recreation – one (1) of which was received during the extended scoping period. One commenter expressed concern that a line would make no longer it safe to hunt, while another was concerned with land being opened to illegal use by ATVs. Two were concerned with the potentially decreased enjoyment of the area, during both the construction and operational phases of the proposed Project.

5.5.11 Route Alternatives

Twenty-three (23) comments were received regarding general routing guidelines and suggestions – four (4) of which were received during the extended scoping period. Commenters requested that homes, residences, and private property be avoided when choosing a final route. Other general comments included suggestions to follow existing transmission corridors, easements, major roads – specifically Highway 17 – to reduce potential impacts to undeveloped areas. One commenter suggested using the Francis Marion National Forest instead of private property.

Four (4) comments were received regarding specific routing alternative suggestions to the Belle Isle segment(s); two (2) regarding Britton Neck; ten (10) for the Charity segments; four (4) regarding Honey Hill; and nineteen (19) comments regarding the Jamestown corridors. One (1) was received during the extended scoping period regarding Charity; one (1) regarding Jamestown; one (1) regarding Honey Hill; and nine (9) regarding the added Commonwealth alternative. The following is a summary of route alternative comments organized by Project source option.

Belle Isle to McClellanville

- Continue to run the line which runs under the surface substrate of the Delta underground and parallel to Highway 17, in order to protect the additional flyway that links the Delta, the Francis Marion National Forest, and the Santee Coastal Reserve, all the while being

safer to humans and less liable to damage in storm winds (Santee Preservation Society, N-001).

Britton Neck to McClellanville

- Traversing the Santee Delta and private lands under easement pose a threat to biological resources, historical/cultural, and visual/aesthetic resources; endangered and migratory bird species, and recreational uses (Coastal Conservation League, N-002).

Charity to McClellanville

- Those corridors that parallel Highway 17 have the advantage of avoiding red-cockaded woodpecker cavity tree clusters. Charity 2 and 4 segments are preferable to Charity 1 and 3 segments because they avoid impacts to water and visual/aesthetic resources (Santee Preservation Society, N-001).
- Following the existing 230 kV Santee power line that runs from Charity to Honey Hill impacts an already existing right-of-way and avoids private lands and national forest (Clifford Bye, I-003-006).
- Charity 4 segment should be evaluated further to determine if more existing right-of-way along Highway 17 could be used for the proposed transmission line (Coastal Conservation League, N-002-034).
- Avoid the area along and next to 8965 Highway 17 to avoid impacts to forest, agricultural, and residential land (Elizabeth Archer, I-002-001).
- Charity 4 transmission line would be most preferable (after no action) because it largely parallels existing infrastructure (John Sisson, I-027-004).

Commonwealth to McClellanville (alternative added during Scoping)

- Should be favored since it parallels an already existing right-of-way for the majority of its length.

Honey Hill to McClellanville

- Should be ruled out since 96 percent of the proposed line would go over or through wetlands (Santee Preservation Society, N-001).

Jamestown to McClellanville

- The existing power line from Belle Isle would be more feasible, cost less, and disrupt fewer people (Stephanie Shuler Hamlet, I-001); this route should be preferred (Burness Edwards Jones, I-008).
- Use the National Forest and existing easements near the road to reduce impact to citizens, their private property, and heritage; as opposed to wetlands, alligators, woodpeckers, and national forests (Richard E. Mancill, I-012).
- Choose a corridor that crosses the Santee River and runs the Project into McClellanville via Highway 17 in order to avoid bias in the MCS analyses (David Shuler, I-018).
- Run the power line underground to avoid impacts to visual/aesthetic and biological resources and increase health and safety.
- Following Route 17 is favorable since it is an existing right-of-way that is more direct with access and lines already present (Gaskins, I-041, and Shuler-Rodin, I-040).
- Making use of existing roads and transmission corridors is preferable to ones that require disturbing environment (Santee Preservation Society, N-001).
- Avoid the Jamestown route in order to avoid impacts to historic, cultural, water, wildlife, visual/aesthetic, biological and socioeconomic resources; and Threatened and Endangered Species; especially near French Santee Road (Jay Lyday, I-010).

5.5.12 Socioeconomic Resources

Thirty-nine (39) comments were received regarding socioeconomic resources – five (5) of which were received during the extended scoping period. In general, commenters asked that the EIS study the potential direct, indirect, and cumulative social and economic impacts from the proposed Project. Several made observations about the costs and benefits of the proposed Project, whereby the benefits may fall short when compared to the environmental costs. A few commenters questioned the comprehensiveness of the cost analysis, suggesting that additional maintenance costs, along with the cost to build a new substation in Jamestown, had been ignored. The commenters asked that property devaluation be assessed in regards to potential impacts to visual resources, loss of farmland, and potential dissection of property. Specific recurring themes included potential impacts to property values, real estate values, ability to sell property, resale value, investments, customer electric rates, environmental and intrinsic values of properties that are not quantifiable, quality of life, municipality revenues, and biological resources which make up the economic and cultural values of the area. Commenters also suggested measures to mitigate potential negative impacts from the proposed Project and specifically suggested burying the transmission line to mitigate potential visual impacts.

5.5.13 Threatened and Endangered Species

Twenty-three (23) comments were received regarding threatened and endangered Species – five (5) of which were received during the extended scoping period. Most commenters suggested that the proposed Project avoid potential impacts specifically to the federally endangered red cockaded woodpecker; one mentioned gopher frogs, a species of federal concern. Another commenter mentioned that he believed he had spotted an Ivory Bill Woodpecker, a Class 6 Species which is “definitely or probably extinct.”

5.5.14 Biological Resources

Seventeen (17) comments were received regarding general biological resources, without further specification. Other comments were more specific to vegetation and wildlife, addressed in sections 5.5.15 and 5.5.18, respectively.

5.5.15 Vegetation

Twenty-two (22) comments were received regarding vegetation – four (4) of which were received during the extended scoping period. Many of the vegetation concerns by commenters included impacts to the longleaf pine stands and mixed pine hardwood forests of the Francis Marion National Forest, which are habitat for the endangered red-cockaded woodpecker, and a variety of neo-tropical migrants, amphibians and reptiles. Several more included concerns for potential impacts to the Santee Coastal Reserve Wildlife Management Area, Santee River Delta, and Cape Romain NWR, which are dominated by wetlands and tidal marsh and are important wintering areas for waterfowl and shorebirds.

5.5.16 Visual and Aesthetic

Forty-nine (49) comments were received regarding visual and aesthetic resources – one (1) of which was received during the extended scoping period. Most commented that the proposed Project would impact visual resources including the pastoral character of the area, residential areas, private property, wilderness areas, and pristine areas.

5.5.17 Water Resources and Wetlands

Fifty-three (53) comments were received regarding water resources and wetlands – four (4) of which were received during the extended scoping period. Most of the comments suggested that the EIS consider the potential cumulative impacts to wetlands and that they ultimately be avoided. A few more pertained specifically to the Santee River Delta, citing the largest river delta on the Atlantic Coast as one of the best locations in the southeastern United States to reliably see large numbers of swallow-tailed kites and other migratory birds and waterfowl. The same commenter suggested that the proposed lines running through wetlands and the Wambaw Creek Wilderness Area should be eliminated from further consideration in the EIS.

5.5.18 Wildlife

Thirty-one (31) comments were received regarding wildlife and wildlife habitat – five (5) of which were received during the extended scoping period. General comments mostly expressed

concern about potential impacts to wildlife and wildlife habitat for common species. Some commenters suggested that the proposed Project avoid potential impacts to state or federally protected species and habitats including those for the red-cockaded woodpecker. Commenters also expressed concern for potential impacts to avian species, their migratory routes, and wetland and riparian habitats, and that the potential effects (i.e., bird collisions) of a large transmission line could be substantial. Commenters also asked that the Santee Delta River, Santee Coastal Reserve Wildlife Management Area, Wambaw Creek Wilderness Area, Cape Romain NWR, and Francis Marion and Sumter National Forests be avoided for their biodiversity significance and high-quality habitat.